

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO  
RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO  
RICO

Debtor<sup>1</sup>

CIVIL NO.: 17-BK-03283 (LTS)

PROMESA

TITLE III

**RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE TWENTY-  
THIRD OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH  
OF PUERTO RICO TO EXACT DUPLICATE CLAIMS [ECF NO. 6272]**

**TO THE HONORABLE COURT:**

**COMES NOW** creditor **Ismael Centeno**, through the undersigned counsel, and respectfully responds in opposition to the Twenty Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Exact Duplicate Claims [ECF No. 6272] “the Objection”), and states and prays as follows:

1. The Commonwealth of Puerto Rico (“Debtor”) has objected to some of creditor Ismael Centeno’s timely filed proofs of claim as duplicative.

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

2. Ismael Centeno has filed two proofs of claim pertaining to damages claimed on behalf of his two children in the pending State Court case *Rosa Lydia Vélez vs ELA*, KPE 1980-1738: Claim No. 58447 on behalf of minor M.I.C.V. and Claim No. 60420 on behalf of minor J.P.C.V..

3. In Debtor's Objection No. 291, Prime Clerk Claim No. 58447, for \$150,000.00 is not duplicative. This claim is different and distinct from Claim No. 60420 as it pertains to two different children of Ismael Centeno.

4. In Debtor's Objection No. 291, Prime Clerk Claim No. 58447, Ismael Centeno moves the Court to deny Debtor's objection.

5. Ismael Centeno expressly reserves any rights in connection therewith and requests that, the non-substantive disallowance requested by Debtor should not prejudice Ismael Centeno's rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

In Hormigueros, Puerto Rico, on this 27<sup>th</sup> day of May 2019.

**I HEREBY CERTIFY** that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record, and served a copy of the same via e-mail to Counsel for the Oversight Board and to the Creditors' Committee.

**s/ María Herminia Cotto-Nieves**  
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